

# EXHIBIT 16

## RESPONSE TO OMNIBUS OBJECTION

### I. CONTACT INFORMATION

Name: Felicita Hernández Hernández

Mailing Address Cond. Bayamonte Apt. 1805  
Bayamon, P.R. 00956

Contact Phone Home: 787-200-5283 Cell 787-615-8766

### II. Caption

#### A. Clerk's Office

United States District Court  
Room 150 Federal Building  
San Juan Puerto Rico 00918-1767

#### B. Commonwealth of Puerto Rico et al. (Debtors)

#### C. Case Number: 17 BK 3283-LTS

#### D. Omnibus Objection regarding amounts not paid by the Commonwealth of Puerto Rico:

Evidence by proof of claim numbers:

#49762 – Act 89 – *Romerazo* – Effective July 1, 1995

#94057 – June 6, 2008 Pay Scale Act – Step Increases

#96621 – Act 96 (2002) of Dr. Pedro Rosello – effective July 2002  
Act 164 (2004) of Ms. Sila Calderón – effective January 2004

### III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 89 “*Romerazo*” – Effective July 1, 1995

June 6, 2008 Pay Scale Act – Step Increases

Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Ms. Sila M. Calderón, effective January 2004

#### IV. Supporting Documentation

Claim #: 176160

Enclosed are documents evidencing the years of service with the Puerto Rico Telephone Company, ~~Ponce~~ *San Juan*, Puerto Rico, from the 30th of March of 1977 through the 12th of July of 1999. I ended my career as a \_\_\_\_\_ with the Puerto Rico Telephone Company, ~~Ponce~~, Puerto Rico, Commonwealth. Claim is made under the applicable laws that cover these years of ~~educational~~ service.

Enclosed are documents in support of this claim.

Due to the recent emergency situation in Puerto Rico brought on by earthquakes and COVID-19, the responses are being sent on today's date. Please contact me should any additional information or documents be needed.

Felicita Hernández Hernández 1-26-2022

Printed name

[signature]  
Signature

*PS: The PRTC Co was an agency of the government until 1995, when it was sold by the governor in office at the time, Dr. Pedro Rosselló.*

*My claim is based on money owed for wage increases under laws that were enacted during the years that PRTC Co belonged to the Commonwealth of P.R. I hope you will consider my claim.*

Case:17-03283-LTS Doc#:19977-1 Filed:01/31/22 Entered:02/01/22 16:57:30 Desc:  
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**IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS  
ARE SEEKING TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.**

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
Hernandez Hernandez, Felicita	176160	9/25/2020	Commonwealth of Puerto Rico	\$28,800.00
Treatment:	Claim to be Disallowed			
Reason:	Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Puerto Rico Telephone Company which is not part of the Title III proceedings.			

**SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES  
SOLICITAN QUE SU RECLAMO SEA RECHAZADO POR LA RAZÓN INDICADA AQUÍ ABAJO.**

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
Hernandez Hernandez, Felicita	176160	9/25/2020	Commonwealth of Puerto Rico	\$28,800.00
Tratamiento:	Reclamo a ser desestimado			
Base para:	La Evidencia de Reclamo no presenta fundamentos para invocar un reclamo contra el Estado Libre Asociado de Puerto Rico. La Evidencia de Reclamo y la documentación de respaldo solo indican una obligación entre el Demandante y la Telefónica de Puerto Rico, que no forma parte de los procedimientos iniciados al amparo del Título III.			

Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>. If you have questions, please contact Prime Clerk LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

Copias de la Objeción global, y todos los escritos radicados en el marco de las causas conforme al Título III, están disponibles, de manera gratuita, en <https://cases.primeclerk.com/puertorico>. Si tiene alguna pregunta, comuníquese con Prime Clerk LLC llamando al (844) 822-9231 (número gratuito para Estados Unidos y Puerto Rico) o (646) 486-7944 (para llamadas desde el extranjero), disponible entre las 10:00 a.m. y las 07:00 p.m. (AST) (hablamos español).



PRT/CLARO  
P.O. Box 360998  
San Juan PR 00936-0998

### **CERTIFICATION**

**FELICITA HERNÁNDEZ HERNÁNDEZ**  
**XXX-XX-6487**

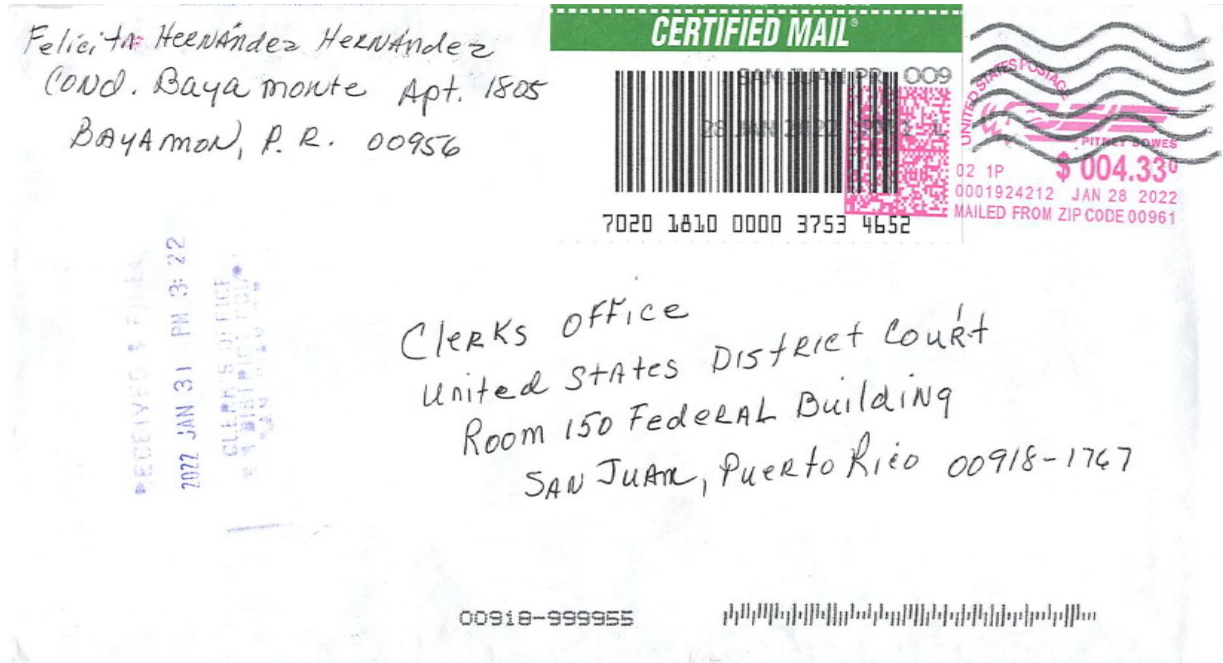
For the former employee referenced above, we certify the following:

- She joined PRT/Claro effective 03/30/1977.
- She worked as a regular employee through 07/12/1999.

This certification confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on Wednesday, September 16, 2020.

*Milly Benítez*

Human Resources Representative  
Compensation and Records





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### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 176160 DN 19977**

Signed this 5<sup>th</sup> of June 2022



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor'.

Andreea I. Boscor

